

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

MIA DESHON GIBSON,

Defendant

Case No. 1:23-MJ-261

**AFFIDAVIT IN SUPPORT OF A CRIMINAL
COMPLAINT AND ARREST WARRANT**

I, George Goll, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of a criminal complaint and arrest warrant charging Mia GIBSON with passport fraud.
2. I am a Special Agent with the Diplomatic Security Service (“DSS”) and have been since August 2017. I am a graduate of the Federal Law Enforcement Training Center’s Criminal Investigator Training Program, the United States Air Force Office of Special Investigations Basic Special Investigations Course, and the U.S. Department of State’s Basic Special Agent Course. As a law enforcement officer, I have conducted and participated in numerous investigations into various types of criminal violations, including passport and visa fraud, alien harboring, conspiracy, bank fraud, identity theft, narcotics offenses, money laundering, sexual assault, human trafficking offenses, and others.
3. I am presently assigned to DSS’s Criminal Fraud Investigations Branch as a criminal investigator, where I specialize in investigations concerning human trafficking, crimes committed by foreign diplomatic personnel within the U.S., visa fraud, passport fraud, identity

theft, and bank fraud. During the course of those investigations, I have examined large volumes of electronic communications to develop probable cause. I have also executed searches and seizures of electronically stored information and provided guidance to other law enforcement officers regarding how to execute searches and seizures of electronically stored information.

4. Prior to joining DSS, I graduated from the United States Air Force Office of Special Investigations (AFOSI) Basic Special Investigations Course to become a Special Agent with AFOSI. In my 12 years as a law enforcement officer, I regularly examined facts and evidence to develop probable cause.

5. Throughout this investigation, law enforcement officers and agents have worked together to collect and record information about the illegal activities of those under investigation. The facts and information contained in the affidavit are based upon my personal knowledge, and information, reports, and evidence obtained from state and federal law enforcement officers.

6. This affidavit contains information necessary to support probable cause for this application. It is not intended to include every fact and matter observed by me, other law enforcement officers, or known to the government. Not every fact known to this investigation or by the government is set forth in this affidavit. Additionally, unless otherwise noted, wherever in this affidavit I assert that a statement was made by an individual, that statement is described in substance, and in part, and is not intended to be a verbatim recitation of the entire statement.

STATUTORY AUTHORITY

7. Under Title 18, United States Code, Section 1543, it is a federal crime for any person to willfully and knowingly use, or attempt to use, or furnish to another for use any such false, forged, counterfeited, mutilated, or altered passport or instrument purporting to be a passport.

8. A “passport card” is a type of passport. *See* 22 C.F.R. § 51.3(e).

PROBABLE CAUSE

A. May 10, 2023 Arrest & Identification of GIBSON

9. On May 10, 2023, an individual later identified as Mia Deshon GIBSON (hereafter, GIBSON) entered the Virginia Credit Union (VACU) branch located at 4001 Lauderdale Drive, Richmond, Virginia, where she presented a passport card in the name of C.G. and attempted to withdraw \$12,000 from C.G.’s VACU account. The bank teller who interacted with GIBSON informed her the account balance of C.G.’s account was \$2,200. GIBSON then attempted to withdraw \$2,000 and signed the VACU bank withdrawal slip as C.G. Following his interaction with GIBSON, the teller requested the assistance of the Henrico County Police Division (HCPD).

10. HCPD deputies responded to the scene and explained to GIBSON that she was being detained due to suspected fraud. In response, GIBSON relayed that she came to the bank to withdraw money from her friend’s grandmother’s account, and that she had provided the bank with an ID that her friend had given her.

11. When the HCPD’s deputies asked GIBSON to identify herself, she stated that her name was “Chanta Chambers” and provided a date of birth and social security number. When law enforcement checks did not return a positive result for GIBSON’s stated identity, deputies once again asked GIBSON about her identity. This time, GIBSON identified herself as Mia Gibson.

12. GIBSON was ultimately placed under arrest. Among other items seized from GIBSON incident to arrest was one Delaware state identification card in GIBSON’s name, and three U.S. passport cards bearing the names C.G., R.M., and D.T. What appears to be a photo of

GIBSON was affixed to the passport card in the name of C.G.; the passport cards in the names of R.M. and D.T. feature photos bearing likeness to an Allegany County, Maryland arrest and booking photo associated with a known individual who I will refer to as “SUBJECT 1.”

13. The following are redacted copies of the recovered passport card in the name of C.G. and the Delaware identification card bearing GIBSON’s name:



15. The Delaware identification card seized by HCPD incident to GIBSON’s arrest featured a photograph which bore likeness to GIBSON, and the name, address, and date of birth listed on that card match the information found in law enforcement databases.

16. Additionally, an analyst with my agency queried law enforcement databases and found a Delaware Department of Motor Vehicles photo associated with a driver’s license in the name of Mia GIBSON that bears likeness to GIBSON (far left photo below), as featured in both her arrest photo on May 10, 2023 (middle photo below), and the photo featured on the U.S. passport card presented in the name of C.G. (far right photo below):



17. Analysts with my agency conducted social media and open-source searches of GIBSON. Those searches yielded results featuring a Facebook profile of a “Mia Gibson,” an individual bearing likeness to GIBSON. Mia Gibson’s Facebook profile likewise features pictures of an individual bearing the likeness of the individual featured on the U.S. passport cards in the names of R.M. and D.T. (subsequently identified as SUBJECT 1) that GIBSON had in her possession at the time of her arrest.

18. The Consular Consolidated Database is a U.S. Department of State internal system that holds application information for all U.S. passports. Within that system is a function – American Citizen Records Query (ACRQ) – that allows specific personnel to search for U.S. passport applications. I queried the passport card numbers featured on the U.S. passport cards in GIBSON’s possession at the time of her arrest. A query of the passport card number affixed to the U.S. passport card presented by GIBSON in the name of C.G. returned no results.

19. A query of the passport card numbers affixed to the U.S. passport cards in the names of R.M. and D.T. returned one result: that U.S. passport card number is associated with a different individual who does not bear likeness to the photographs featured on the U.S. passport cards in the names of R.M. or D.T. Additionally, I know from my training and experience that

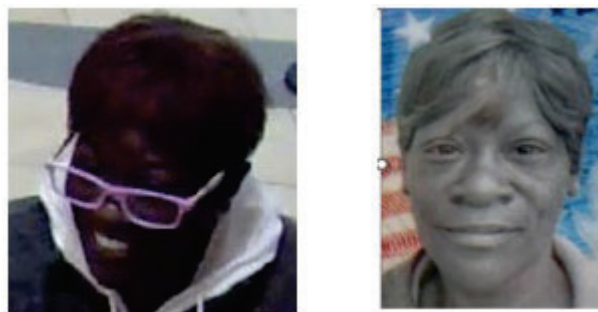
U.S. passport card numbers are unique, and duplicate numbers will not be produced by the U.S. Department of State on legitimate passport cards for different individuals.

B. May 8, 2023 Passport Fraud

20. On May 8, 2023, an individual bearing likeness to GIBSON (as demonstrated in paragraph 22) entered a branch of VACU located at 2150 Gordon West Shelton Boulevard, Fredericksburg, Virginia, where she knowingly used an account number in the name of P.K. and a passport card in P.K.'s name but featuring a photo bearing likeness to GIBSON in order to withdraw \$3,500 from P.K.'s account without P.K.'s consent. The \$3,500 was under the custody or control of VACU, a financial institution as defined by Title 18, United States Code, Section 20.

21. An ACRQ query confirmed P.K. has never been issued a genuine U.S. passport card. P.K. was issued a U.S. passport book in 2017, and the photo of P.K. depicts a Caucasian woman.

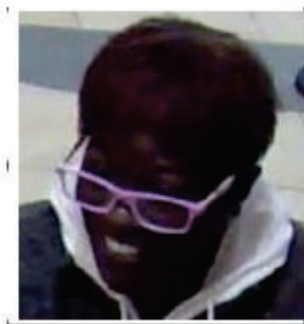
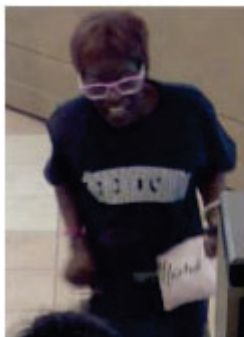
22. VACU staff members provided surveillance camera images of the individual who presented the passport card in the name of P.K. That individual is featured in the below photo on the left, and, for comparison, the passport card in the name of C.G. is featured on the right:



23. VACU staff provided surveillance camera images of a white Jeep Renegade with a license plate ending in “8851” that was present at the time the individual presented a passport card in the name of P.K. and withdrew money from P.K.’s account:

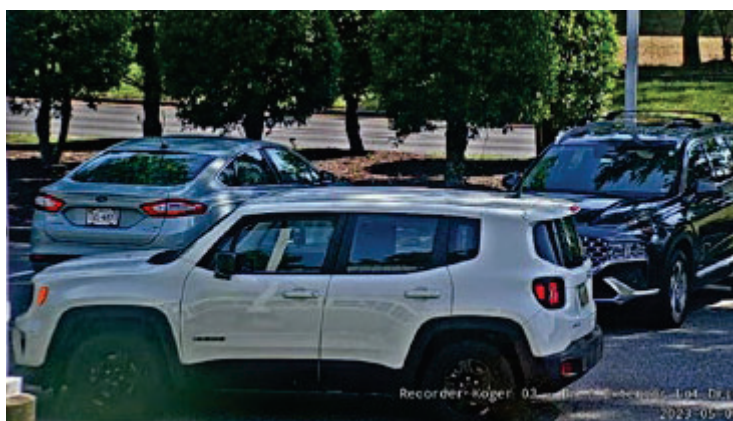


24. Also on May 8, 2023, an individual bearing likeness to GIBSON (and to the same person who presented a passport card in the name of P.K. at the VACU Fredericksburg branch) entered another branch of VACU, this one located at 1200 Koger Center Boulevard, Richmond, Virginia, where she presented a passport card in the name of D.L. and withdrew \$5,100 from D.L.’s account. VACU staff members provided surveillance camera images of the individual who presented the passport card in the name of D.L. That individual is featured in the below photo on the left; the individual bearing likeness to GIBSON who presented a passport card in the name of P.K. is in the center; and, for comparison, the passport card in the name of C.G. is featured on the right:



Also of note, the individual who presented passport cards in the names of P.K. and D.L. on the same day at two different VACU locations appears to be wearing the same pink-framed eyeglasses.

25. VACU staff provided surveillance camera images of a white Jeep Renegade that was present at the same time as the individual who presented the passport card in the name of D.L., and that Jeep Renegade appears to be the same make and model as the white Jeep Renegade associated with the individual who presented a passport card in the name of P.K. at the Fredericksburg VACU branch:



26. An ACRQ query confirmed D.L. has never been issued a genuine U.S. passport card.

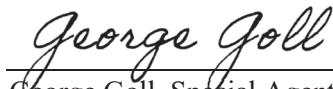
27. SUBJECT 1, along with two associates, was encountered by an officer with the Hopewell Sheriff's Office on May 10, 2023, during a traffic stop in Hopewell, VA. The vehicle subject to the traffic stop was a white Jeep Renegade with Ohio license plate number "JVH 8851," which appears to be the same vehicle associated with the VACU withdrawals that occurred in the names of P.K. and D.L. referenced above. Of note, that same day (May 10, 2023), an individual bearing likeness to SUBJECT 1 presented a fraudulent passport card in the name of W.B. at the VACU branch located at 1200 Koger Center Boulevard, Richmond,

Virginia, and withdrew \$8,700 from W.B.'s account. This is the same VACU where, two days earlier, the individual bearing likeness to GIBSON presented a fraudulent passport card in the name of D.L. and successfully withdrew funds from D.L.'s account.

CONCLUSION

28. Based on the foregoing information, I respectfully submit that there is probable cause to believe on May 8, 2023, in Fredericksburg, Virginia, within the Eastern District of Virginia, GIBSON willfully and knowingly used and attempted to use a false, forged, and counterfeited passport, in violation of 18 U.S.C. § 1543.

Respectfully submitted,



George Goll, Special Agent
Diplomatic Security Service

Subscribed and sworn to before me in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on November 28, 2023:



Digitally signed by Ivan Davis
Date: 2023.11.28 13:49:28 -05'00'

The Honorable Ivan D. Davis
United States Magistrate Judge